

**Department of the Treasury
Chief, Regulations and Procedures Division,
Alcohol and Tobacco Tax and Trade Bureau,
Attention Notice No. 34
PO Box 14412
Washington DC 200044-4412**

June 7, 2005

Don Hartford Comment to Petition to Establish Fort Ross-Seaview Viticultural Area (2003R-191T)

I, Don Hartford, am President of Hartford Family Winery and make the following comments to the petition to establish a Fort Ross-Seaview Viticultural Area:

- 1.) Hartford Family Winery is a California Winery, located in the Russian River Valley, which grows grapes and makes wine from grapes from the Sonoma Coastal Mountain ridges as well as from the Russian River Valley, Green Valley, Carneros, and Anderson Valley.
- 2.) The proposed Fort Ross-Seaview Viticultural Area excludes vineyards on the Sonoma Coastal ridges that are located to the north of the proposed AVA as well as Vineyards to the South.
- 3.) Hartford Family Winery has made wine from vineyards within the proposed Fort Ross-Seaview Viticultural Area and from a Coastal Mountain vineyard to the south and one to the north of the proposed viticultural area. Winery co-leases the vineyard to the north of the proposed AVA with La Crema Winery.
- 4.) The information presented by petitioner in regard to soils types, climate, and elevation above fog intrusion is adequate to distinguish the proposed viticultural area from existing Sonoma AVA's and appellations, but is inadequate to distinguish it from what has been referred to by some as the "True Sonoma Coast" – i. e. the coastal ridges immediately to the north and south of the proposed area.
- 5.) The information and arguments made by Petitioner for separating the proposed AVA from the "True Sonoma Coast" are based on overly simplistic generalizations about climate and soil that are unsubstantiated by scientific reports comparing the climate described in the proposed viticultural area to the rest of the "True Coast or by distinguishing the soils within the proposed AVA from neighboring soils and those along the length of the "True Coast".

Exhibit B to the petition points out the inadequacy of the climatic information for the purpose of distinguishing the climate of the proposed area from the rest of the "True Coast". On page 9 and at page 9 footnote 4 of Exhibit B to the petition, it states that: it is "a general intention that the regional classification system be used only over wide areas", it quotes one of the reports as saying that " a single year's data is not enough to classify

this area”, and notes that the unknown author of one of the few degree day reports that it relies on “admits an upward skewing may be present” and that in regard to that report that the temperature gauge was moved from a position in the sun to a position in the shade in May.

In the end, degree day reports were submitted from only three sites and these reports showed a range between Region I and Region III. No reports on Climate were submitted from neighboring vineyards north of the proposed AVA. Exhibit B at page 4 and page 6 notes that the Sisson Classification for the proposed area is a “Coastal Cool” classification. A map of the “Coastal Cool” area on page 6 of Exhibit B shows that the coastal cool climate type runs the length of the Coastal Range north of the Russian River and includes the area planted to vineyards immediately north of the proposed AVA.

Exhibit B to the petition, for the most part, gives little to no importance to soils for the purpose of establishing the proposed AVA. On page 10 of the Exhibit B Report, it states: “A predominate soil series present throughout much of the region is the Hugo Series and related complexes. This soil type is typical of much of the coastal mountain ranges of Sonoma and Mendocino Counties”. The report goes on to say that the soils are varied and lack alluvium. The soils listed as present include Goldridge, Hugo, Joesphine, and Yorkville among others. I am not aware of anything in the information submitted to justify the AVA that distinguishes these soils types from those of other vineyards on the “True Coast” (the Sonoma Coastal ridges). Specifically no comparison is made to soils of excluded vineyards to the north.

6.) No persuasive evidence is presented to justify exclusion of the vineyards north of the proposed area. There is no information presented that shows that the northern vineyards do not have “Coastal Cool” or equivalent degree summation days to vineyards within the proposed area. There is no information presented that shows that the northern vineyards’ soils are not varied, well drained and lacking alluvium. There is no information presented that shows that the mountain vineyards to the north are located so low in elevation that they are nearly always covered in fog such that they are no longer “Coastal Cool” sites.

7.) I have reviewed relevant Soils Maps of Sonoma County. Soils that are described as present in the proposed AVA are present in the mountain ridges to the north as well. Goldridge soils are shown as particularly prevalent in the northern part of the proposed AVA. (See page 12 of Exhibit B to the Petition). The soils on the vineyard from which Hartford Family Winery makes wine north of the proposed area are also Hugo series and Goldridge soils that are well drained and lack alluvium.

8.) The vineyard from which Hartford Family Winery makes wine is situated sufficiently above marine fog intrusion to ripen grapes.

9.) Petitioner at page 10 in the Exhibit B to his petition states that the “generally accepted translation of Coastal Cool to the regional classification systems is that of degree day accumulations in the higher Region I and lower Region II classifications.”

I have reviewed Adcon information and have had calculated the Winkler-Amerine Degree Day Accumulations for 2003 and 2004 at the Vineyard from which Hartford Family Winery makes Wine. This site is a high Region I site in both years with degree day accumulations of 2362 in the year 2003 and 2393 in the year 2004.


10.) The 900 foot elevation in the Sonoma Coast Mountains is not necessarily an elevation that separates Marine Cold climates, in which there is too little solar radiation to ripen grapes, from a Coastal Cool climate that supports viticulture. Not only elevation but proximity to the Coast and the elevation of a ridge or ridges between a vineyard and the Coast are other factors that need to be understood before judging whether a vineyard's climate on the Sonoma Coastal ridges is "Coastal Cool" or Marine. Such specific information needs to be presented to the TTB in order to justify creating a boundary between the proposed AVA and vineyards nearby. As far as I know, no such information was provided to the TTB.

11.) To my knowledge, Petitioner did not try to contact vineyard owners to the north of the proposed AVA to learn whether the growers on the northern ridges had information to support or rebut including or excluding the northern vineyards from the proposed AVA.

12.) In my view there may be sub-appellations into which the "True Sonoma Coast" (the Coastal ridges) may be distinguished from the remainder of the coastal mountains, but more information and the cooperation of all growers both north and south of the proposed AVA are necessary. Without information from the other growing areas along the Sonoma Coast, the TTB runs the risk of creating multiple AVA's where unjustified or of drawing boundaries where they do not belong.

13.) I question whether a new AVA should bear a name that relates to a Winery within or outside its boundaries because it could lead to potential confusion and dispute over the name used. Fort Ross is a Winery and Vineyard within the proposed AVA and Seaview is an Australian wine brand owned by Southcorp.

14.) The TTB should withhold decision approving or denying a new AVA in the Sonoma Coastal Mountains in order to let the affected growers meet and gather sufficient evidence to submit to support including or excluding vineyards to the north and south of the proposed viticultural area.


By Don Hartford
President, Hartford Family Winery
Dated June 7, 2005